

ENVIRONMENTAL ASSESSMENT FOR
THE THORLEY DIVISION FENCE

EA # NV-040-03-008

United States Department of the Interior
Bureau of Land Management (BLM)
Ely Field Office

By: Shirley Johnson, Rangeland Management Specialist

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I. BACKGROUND INFORMATION

This site-specific EA analyzes the effects of installing a fence in order to create a new grazing use area in the Wilson Creek Allotment. It provides information and analysis necessary to evaluate the impacts of the Proposed Action.

The Final Wilson Creek Allotment Evaluation was completed in 1992. The document evaluated the livestock grazing practices and forage use by wild horses and wildlife. The Wilson Creek Final Multiple Use Decision (FMUD) was issued in 1992, which altered Federal grazing permits with the reduction of permitted use animal unit months (AUMs). It established an appropriate season of use, by use area, set appropriate management levels for wild horses, and recommended specific projects to implement various elements of the decision to improve rangeland conditions. The proposed project was specifically recommended in the FMUD.

Need for the Proposal

The installation of the Thorley Division Fence is needed to create a separate grazing use area from the Dry Lake Valley Use Area in the Wilson Creek Allotment (Appendix I, Map 1) and to provide improved livestock distribution and better monitoring and management of vegetation resources. These areas are inadvertently grazed in common due to the lack of a defined boundary between the Thorley Use Area and the Dry Lake Valley Use Area.

This action would aid the BLM in managing the rangeland resources and more effectively evaluate grazing operations in the use areas. Drift of livestock between the two areas makes the monitoring and evaluation of cattle and sheep use difficult because the permitted use is allocated to these areas separately, but separate use is not maintained.

The objectives of the proposed fence are to: 1) improve the management of the natural resources, which would increase the quality of habitat for wildlife and wild horses, 2) provide the permittees in both use areas with better control of their livestock, and 3) improve the periodic evaluation of grazing by domestic livestock, wild horses and wildlife. This project would improve grazing use, which would improve rangeland conditions in relation to the Mojave Southern Great Basin Resource Advisory Council Standards and Guidelines for Rangeland Health.

The project would be constructed in compliance with applicable Standard Operating Procedures (SOP) for fence construction (Appendix II), requirements for protection of cultural resources, and applicable prevention activities as described within the Weed Prevention Schedule (Appendix III). Construction actions would follow district policy for the protection of migratory birds. If construction should need to occur during the period of May 1 to July 15, a breeding bird survey would have to occur in the project area to identify if migratory bird breeding or nesting is occurring in the area. In this case, construction would be delayed until after July 15. This is in accordance with Ely BLM policy regarding migratory birds.

Relationship to Planning

The proposed action is in conformance with the Schell Management Framework Plan (MFP) that was completed in 1982. The Schell MFP-III RM-4 decision states “Install livestock management facilities to enhance range management.” The proposed action is also in conformance with the Schell Grazing Environmental Impact Statement and Record of Decision that supported developing fence projects to “improve distribution of livestock and therefore utilization of vegetation.” The proposed action is consistent with the Lincoln County Public Land and Natural Resource Management Plan (1997) which states, “Grazing shall be managed to support a healthy range resource.” The proposed action was specifically recommended in the Wilson Creek Final Allotment Evaluation (p. 20) (1991).

Issues

During internal scoping it was determined that the proposed fence would occur in the Dry Lake Valley Wild Horse Herd Management Area (HMA).

II. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Proposed Action

The proposed action is to construct approximately 4.7 miles of fence according to BLM fencing standards for wildlife, livestock, and horses. The fence would be located in the Wilson Creek Allotment, at Township 1 North, Range 64 East, Sections 5, 6, 9 and 10 and T. 1 N., R. 63 E., Section 1 (Project Map 2, Appendix I).

The fence would be located within the Dry Lake Wild Horse HMA. To protect the health and the wild, free roaming nature of the resident horse herd, the newly constructed fence would have highly visible flagging on each fencing stay (a wire in between each post hold wires taut) to make the new fence visible to horses. The fence would be completely open on the west end to allow horses to travel around the end of the fence to the lower end of the HMA.

The fence would follow specific guidelines for wire type, wire spacing and design to protect resident wildlife. The top three wires would be barbed and the bottom wire would be smooth. The spacing from ground up would be 16”, 6”, 8”, and 12” for a total fence height of 42”. This spacing is designed to provide safe travel through or over the fence particularly for antelope and mule deer. Posts would be made of steel and braces would be constructed of either wooden or galvanized steel posts. Posts would be spaced 16 feet / 6 inches apart with wires stretched tight.

The project would involve three stages to completion including: 1) on site survey and design, 2) a Class III cultural inventory (performed by the BLM, 3) fence construction, and project inspection. Some cross-country travel would occur during the development of the project. However, limiting vehicle travel to the fence corridor would minimize overall disturbance. Normal maintenance of the fence would be part of the proposed action.

The fence would be designed and constructed by the permittee who is a trained engineer. Prior to construction, the BLM would conduct a Class III cultural inventory to ensure that no culturally significant sites are disturbed. Construction of the proposed fence is expected to take approximately four weeks to complete. However, more time may be needed due to unforeseen events or weather/soil conditions.

The BLM would inspect the finished fence to ensure strict compliance with specifications (wire spacing, post spacing, flagging, etc.). SOPs for this project are found in Appendix II. The permittee would assume construction and maintenance responsibility through a Cooperative Agreement.

The No-Action Alternative

Under the No-Action Alternative the fence would not be constructed. Grazing operations would remain virtually unchanged with livestock drift and the possibility of overuse of forage resources continuing to occur. This condition could eventually cause the area to not meet the standards for rangeland health.

Without the fence, the smaller Thorley Use Area (27,506 acres) in comparison to the much larger Dry Lake Valley Use Area (104,896 acres) would always have the possibility of receiving greater use by livestock and horses than it can support, especially in times of poor weather since livestock drift southward. The south end of the Thorley Use Area is 18 miles south of the northern boundary of the Dry Lake Valley Use Area. When cattle are spooked or move south due to the weather, they end up in the Thorley Use Area and have to be pushed back to the north.

Alternatives Considered But Eliminated From Detailed Analysis

A. Combine Use Areas and Eliminate the Thorley Use Area and the Need for the Fence

This alternative is undesirable because it would not achieve the objectives identified in the Need for the Proposal. Two separate use areas are needed to maintain separate permits to improve the analysis of the impacts of the individual operations on rangeland health. Permitted use AUMs are allotted to the ranchers on the Wilson Creek Allotment based on water and land that they own that can support their herd. Combining the use areas would cause great dissention among the ranchers because of individual established water rights and allotted use.

The relatively small geographic area of the Thorley Use Area compared to the Dry Lake Valley Use Area would allow for the continuing inequitable, and uncontrolled grazing use. The Final Allotment Evaluation determined the areas to be in need of increased livestock control to utilize the forage resources at lower levels to achieve healthy range conditions.

B. Use of Water and/or Salt

Water is well distributed on the Dry Lake Valley Allotment. The Bullfrog Reservoir (also known as Lower Reservoir) is only two miles from the northeast corner of the Thorley Use Area. While salt is being used currently, it is not an effective deterrent to livestock drift. It is an appropriate tool for increasing distribution. In addition, wild horses make substantial use of salt blocks causing a socioeconomic impact to the ranchers' operations.

III. DESCRIPTION OF THE AFFECTED ENVIRONMENT

The project site is in the Wilson Creek Allotment, managed by the Ely Field Office and Caliente Field Station. The Thorley Use Area and Dry Lake Valley Use Area are smaller management units within the allotment. The Thorley Use Area is bounded by the Simpson Allotment to the east, the Rattlesnake Allotment to the south, and the Deadman Use Area to the west. There are no designated wilderness study areas in or near the vicinity of the proposed action.

Rangeland Resources (Vegetation, Soils, Livestock Operations)

The vegetative community is commonly referred to as salt desert shrub. In southern Nevada, this community occurs in the spacious basins between the mountain ranges. This community is characterized by low growing vegetation (most shrubs less than two feet in height), salty or alkaline soils, with the vegetation consisting of shrubs: four-wing saltbush (*Atriplex canescens*), ephedra (*Ephedra nevadensis*), shadscale (*Atriplex confertifolia*), spiny hopsage (*Grayia spinosa*), winterfat (*Eurotia lanata*) and rabbitbrush (*Chrysothamnus spp.*); grasses: sand dropseed (*Sporobolus cryptandrus*), Indian ricegrass (*Oryzopsis hymenoides*), small galleta (*Hilaria jamesii*), and burro grass (*Scleropogon brevifolius*); and forbs: globemallow (*Sphaeralcea ambigua*) and Indian plantain (*Plantago patagonica*). (Note: some scientific names have been changed. Those changes are not represented here.)

Soils present in the project area include fine-grained silt in the very bottom of the basin. These soils are very deep with heavy concentrations of alkaline salts and contain little or no rock or gravel. Soils out of the bottoms have a more gravelly texture and become shallower. Rock outcrops are observable in these areas and could mean buried rock in the project area. Pleistocene lakes, now dry, occur throughout Dry Lake Valley but are not mapped in the project area.

Cattle, sheep and wild horses graze in the project area. Cattle are the only domestic livestock that currently graze the Thorley Use Area, however, through agreement sheep would be allowed to graze south of the proposed fence, in times of need or as a management tool.

Wild Horses

The area is located within the Dry Lake Wild Horse Herd Management Area (HMA). The Wilson Creek Final Multiple Use Decision, 1992 established an AML of 94 horses for the Dry Lake Wild Horse Herd Management Area. The HMA is approximately 494,000 acres. The Thorley and Dry Lake Valley use areas encompass approximately 27% of the HMA.

Wildlife

Numerous wildlife species are dependent upon the salt desert shrub community. The project is located within mule deer winter range and yearlong pronghorn antelope range. Numerous predators such as mountain lions, bobcats and coyotes probably inhabit the area. A variety of migratory birds utilize the area during migration and nesting seasons. Raptors breed and winter in the area and prey on small mammals and reptiles.

Noxious and Invasive Species

Halogeton and cheatgrass are two invasive species present in the use areas. On the Rattlesnake Allotment, approximately eight miles south of the project site, salt cedar, Russian knapweed, and perennial pepperweed, all noxious weed species have been mapped. Bull thistle, a noxious weed, was mapped in the HMA, 27 miles from the project area.

Visual Resources Management (VRM)

The proposed project occurs in a VRM Category area classified as Class IV. Class IV is the lowest priority VRM class. Projects and activities can occur in Class IV areas and can even dominate the major focus of the view, but should still be made to minimize the visual impact.

Cultural and Historic Resources

An inventory of BLM records indicate there are ten recorded cultural sites within one mile of the proposed project but no known sites exist in the direct path of the fence line.

Socio-Economic Values

The local economy of Lincoln County depends on tax and income revenue from the local ranching industry. The permits on the Wilson Creek Allotment represent the largest permits in Lincoln County and generate a significant amount of revenue for the local economy as well as those in neighboring counties in Nevada and Utah.

IV. ENVIRONMENTAL CONSEQUENCES

Proposed Action:

The proposed action would have no impacts to the following critical elements of the human environment: Special status species (Federally listed, proposed or candidate threatened or endangered species, and State sensitive species), floodplains, wetlands, and riparian areas, wilderness values, Wild and Scenic Rivers, Prime or Unique Farmlands, environmental justice, water quality and quantity (drinking and ground), air quality, Native American religious concerns, or wastes, hazardous or solid.

Rangeland Resources (Vegetation, Soils, Livestock Operations)

Vegetation would be impacted, as a result of the proposed action, due to vehicles such as pickup trucks, trailers, and 4-wheel ATVs, traveling along the corridor during construction of the fence. This impact would be mostly short-term except plants that sustain damage to the crowns. These impacts would be minimized by limiting travel along the corridor to that which is absolutely necessary and by utilizing ATVs more than full-sized pickup trucks.

No vegetation clearing would be necessary as a result of the proposed action as the vegetation consists of small-stature shrubs. Plants in direct contact with posts, corners and braces would be impacted. Over the long-term, a small corridor of vegetation and soils along the fenceline could be impacted due to cattle-trailing. Soils directly adjacent to the proposed fence could become compacted over many years of trailing by livestock. On 4.7 miles of fence line, the total area impacted by long-term compaction would be 8.5 acres. Trailing along a fence or other barrier is a natural behavior of grazing animals and cannot be mitigated. This trail would be utilized in the maintenance of the fence line.

Soils would be impacted predominately, where the fence crosses silty soils. SOPs in Appendix II would minimize impacts by deferring travel and construction during times of very wet or very dry soil conditions. If erosion is observed due to the construction of the project, native grasses would be seeded to stabilize the sites; though this is not expected to occur.

Wild Horses

No direct impact is anticipated to wild horses due to the implementation of the proposed action. The drift fence would not fully prevent the herd nor individuals from moving in either north/south or east/west directions. They would still be able to graze in the Thorley and Dry Lake Valley Use Areas freely.

The proposed action could indirectly impact wild horses because the presence of a fence could discourage their use of the Thorley Area until they learn to travel up and around the end of the fence.

In the short-term, the fence would have highly visible flagging tied between every post to make the fence more visible to them during the day and night. Horses would eventually learn that a fence was in place.

Wildlife

Wildlife in the area would be temporarily displaced during the construction phase of the fence. Larger herbivores (i.e. deer and antelope) would not be directly affected because they would move away from noise and disturbance during construction. Habitat for deer and antelope would not be impacted and could actually be enhanced because of better livestock management and distribution. The fence design allows for deer and antelope to travel the area unrestricted. There could be short-term disturbance impacts to small, ground-dwelling wildlife during construction. If construction should need to occur during the period of May 1 to July 15, a breeding bird survey would have to occur in the project area to identify if migratory bird breeding or nesting is occurring in the area. In this case, construction would be delayed until after July 15. This is in accordance with Ely BLM policy regarding migratory birds. Migratory birds would not be impacted

Noxious and Invasive Weeds

The proposed action would not likely result in the increase or introduction of noxious or invasive species. A Noxious and Invasive Weed Risk Assessment (Appendix IV) conducted for the proposed action on September 16, 2002 resulted in a low risk rating. The score of eight, allows the proposed action, if approved, to “proceed as planned with initiation of control treatment on noxious weed populations that get established in the area.” The SOPs for weed prevention and detection are included in Appendix III.

Visual Resource Management

The proposed action would not have any impact on the quality of the visual resources in the area. Fences are well within the acceptable actions in an area categorized as VRM, Class IV.

Cultural Resources

No cultural resources would be affected by the proposed action. The fence line would be placed to avoid any known sites. A Class III inventory would be conducted after survey and design of the fence to ensure that no sites, previously unknown, would be impacted by construction.

Social and Economic Values

The proposed action would have positive economic benefits to the ranchers in both use areas as they would spend less time sorting livestock and offspring and trying to run in a buffer zone between two areas. This benefit probably would not translate into a benefit to the local economy.

NO ACTION ALTERNATIVE:

The impacts as described above would not occur. Selection of the No Action Alternative could have an impact to the natural resources identified in the Affected Environment. The Final Multiple Use Decision identified the need for the division fence to curb livestock drift between the two use areas. The Dry Lake Valley Fence built several years ago managed to not only deter livestock from moving between the two use areas, but resulted in overall improved condition of the rangelands on both sides of the fence. Selection of the No Action Alternative would not provide the opportunity to prevent cattle drift.

Selection of the No Action Alternative would be unjust to the operators who are called out to move or remove livestock that are grazing in the wrong location; a condition, which would not occur if the fence was built.

Cumulative Impacts

Past:

Past Actions in the use areas include fence projects. Most of the fences were built between use areas or allotments. Dry Lake Valley is grazed without the benefit of pastures. One fence approximately ten miles to the north, was constructed within the last ten years to create the Muleshoe Use Area and resolve a major livestock drift problem between that area and Dry Lake Valley.

Present:

No other fences are proposed or being considered for the area at the present time. A fence was proposed thirty years ago that would divide Dry Lake Valley use area into two units to separate the sheep and cattle, this was not built.

Reasonably Foreseeable Future:

Two pipelines have been proposed in the Thorley Use Area. These would add reliable water sources for cattle, wild horses and wildlife. Short-term, direct cumulative impacts to soils, vegetation, and wildlife would occur as stated above due to construction activities. Temporary water hauls could be proposed and approved based on annual need for improved livestock distribution especially in times of reduced forage production as in the case of drought. No permanent water haul sites are being proposed at this time.

Most of the long-term cumulative impacts to vegetation, wildlife and wild horses would be positive as better livestock management would lead to better rangeland conditions, improved livestock distribution, and improved riparian condition by precluding the need to water at the spring sources. Wildlife, wild horses, and livestock would all benefit from these additional project proposals.

V. PROPOSED MITIGATION MEASURES

Appropriate mitigation has been included within the proposed action.

VI. SUGGESTED MONITORING

Appropriate monitoring has been included within the proposed action. Monitoring and compliance visits would continue to occur during and after construction of the project. Compliance would be ensured during visits to the site during survey and design, construction and after implementation for final inspection. Project inspections every four years would ensure the fence is properly maintained. The permittee would assume maintenance responsibility through a Cooperative Agreement.

VII. CONSULTATION AND COORDINATION

Intensity of Public Interest and Record of Contacts

Public comments will be solicited for this EA by posting the project proposal on the BLM Ely Field Office website. Changes will be made to the EA based upon public comments as deemed appropriate and feasible.

This project was presented at a Tribal Council Meeting held on December 16, 2003 in Ely, Nevada.

Record of Interested Publics Contacted

Lincoln County Commissioners
Natural Resources Conservation Service
Mr. Gary McCuin, Department of Agriculture (Reno)
Mr. John McLain, Resource Concepts Inc.
Katie Fite, Committee for Idaho's High Desert
Jon Marvel, Western Watersheds Projects
Betsy Macfarlan, Eastern Nevada Landscape Coalition
Shelley Hartmann
George I. Andrus
Jule Wadsworth
Steven J. Carter
Melvin Gardner
Mr. Dan Heinz
Lincoln County Commission
Steve Foree, Nevada Department of Wildlife
Amy Lavoie, US Fish and Wildlife Service
H. Bruce Cox

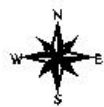
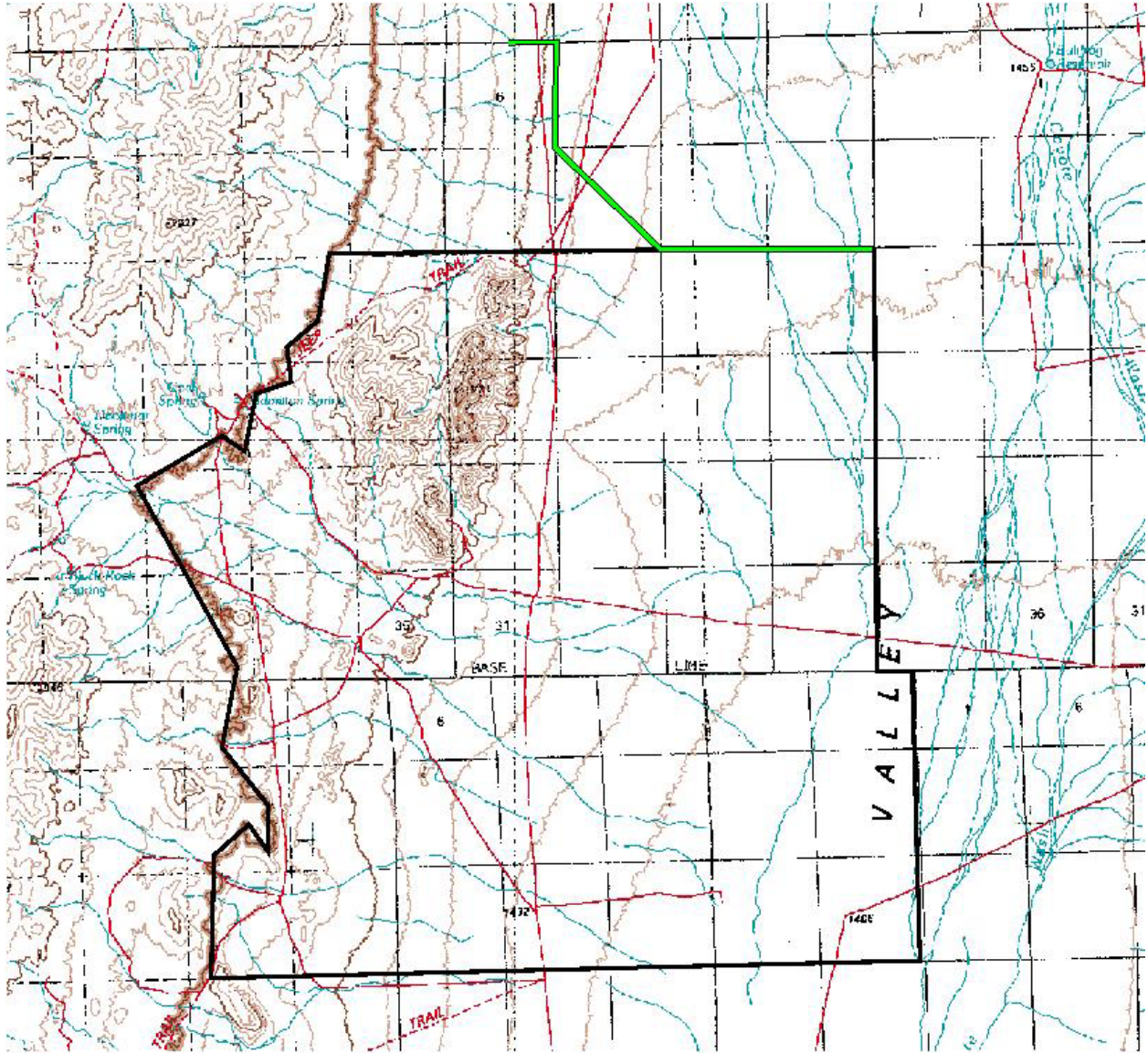
Internal District Review

Jared Redington
Carolyn Sherve-Bybee
William Smith

Bruce Winslow
Susan Baughman
Karen Prentice
Shirley Johnson
Elvis Wall



Wild Horses and Burros
Cultural Resources
Wildlife, Threatened and Endangered Species, Riparian,
and Migratory Birds
Recreation, Wilderness, Visual Resources
Environmental Coordination
Noxious and Invasive Weeds
Range Management/EA Author
Native American Religious Concerns

APPENDIX I



1 0 1 Miles

A horizontal scale bar with alternating black and white segments, marked with '1', '0', and '1' to represent a distance of 1 mile.

 Proposed Fence
 Allotment Boundary

THORLEY DIVISION FENCE ENVIRONMENTAL ASSESSMENT MAP

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

APPENDIX II

Standard Operating Procedures

1. White flagging will be tied at each wire stay for visibility to animal herds. These will remain for a time sufficient to allow wild horses, deer and antelope to see the newly constructed fence
2. Pursuant to 43 CFR 10.4 (G) the holder of this authorization must notify the authorized officer by telephone, with written confirmation immediately upon discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined at 43 CFR 10.2). Further, pursuant to 43 CFR 10.4 © and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.
3. Construction activities will be limited to times when soils are not wet or saturated, to lessen soil compaction by equipment. In addition, construction activities may be delayed by the authorized officer due to severely dry conditions, to prevent unnecessary erosion of soil resources.
4. Vehicle travel shall only be permitted along the proposed fenceline corridor during the construction phase.
5. Maximum corridor width of the fenceline would be a total of 16 feet.
6. All equipment and assorted materials associated with the construction of the project must be removed within 30 days after completion of the project.
7. If the need to use, store, and/or dispose of hazardous materials arises, which is not identified in this EA, the authorized person(s) constructing the project would notify and seek authorization from the BLM.
8. Fence specifications for wildlife concerns will be strictly adhered to in the construction of this fence. These specifications are to be provided to the builder prior to construction.

Appendix III
Excerpts from the Ely Field Office Weed Prevention Schedule

Special Stipulations for Prevention of Noxious Weed Invasions

1. Check body and under carriage of off road vehicles and ATV's for plant material and clean with best available method before leaving weed infested area. Report noxious weed species occurrences immediately to local BLM office and the authorizing officer.
 2. If it is determined that seeding is required, refer to current district seeding guidelines for an appropriate mix and confer with an Ely District Fire Ecologist, minerals reclamation specialist, and/or soil scientist.
 3. Insure that weed-free seed is utilized for reclamation or rangeland reseeding.
 4. Do not pick the flowers of noxious weeds and take them home.
 5. Do not pick and transport wild flowers that you can't identify.
 6. Do not camp or drive in weed-infested areas.
 7. The builder (permittee) will be provided a Noxious Weed Handbook for identification of weeds.
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APPENDIX IV

RISK ASSESSMENT FOR NOXIOUS WEEDS

THORLEY DIVISION FENCE AND CATTLE GUARD

On September 16, 2003, a Noxious Weed Risk Assessment was completed for the Thorley Division Fence and Cattle Guard project of the Wilson Creek Allotment, Lincoln County, Nevada. The project would disturb approximately 9 acres of public lands. The legal description of the proposed project is T. 1 N., R. 64 E., Sections 5, 6, 8, 9, 10 and T. 1 N., R. 63 E., Section 1.

Factor 1 assesses the likelihood of noxious weed species spreading to the project area. For this project, the factor rates as (**MODERATE**) at the present time. The area was inventoried in 2002. The only weed identified in the Thorley Use Area was salt cedar (*Tamarisk ramossissima*) at two springs in the hills. Neither of the springs would be affected by the proposed fence line. Through site visits, I have observed that *Halogeton glomeratus* occurs along the major county roads and in the dry lake bed. Cheatgrass (*Bromus tectorum*), an invasive annual introduced grass, occurs throughout Dry Lake Valley and the surrounding areas. The annual amount is entirely dependent on climate. Tall whitetop (*Lepidium latifolium*) is present in the Rattlesnake Allotment to the south at Rattlesnake Spring but isn't considered a risk due to the construction of this project. Because of the presence of Halogeton and cheatgrass, a rating of 4 is assigned. The construction of a fence would not increase the current distribution of either species.

- | | |
|------------------------|---|
| NONE (0): | Noxious weed species not located within or adjacent to the project area. Project activity is not likely to result in the establishment of noxious weed species in the project area. |
| LOW:(1-3) | Noxious weed species present in areas adjacent to but not within the project area. Project activities can be implemented and prevent the spread of noxious weeds into the project area. |
| MODERATE: (4-6) | Noxious weed species located immediately adjacent to or within the project area. Project activities are likely to result in some areas becoming infested with noxious weed species even when preventative management actions are followed. Control measures are essential to prevent the spread of noxious weeds within the project area. |
| HIGH:(7-10) | Heavy infestations of noxious weeds are located within or immediately adjacent to the project area. Project activities, even with preventative management actions, are likely to result in the establishment and spread of noxious weeds on disturbed sites throughout much of the project area. |

Factor 2 assesses the consequences of noxious weed establishment in the project area. For this project, the factor rates as (**LOW**). The action is not expected to cause any noxious weed

establishment within the allotment. However, because of the possibility of deposition of weed seed through tire treads, a score of **2** is given.

Low to Nonexistent: None. No cumulative effects expected.
(1-3)

MODERATE: Possible adverse effects on site and possible expansion of
(4-7) infestation within the project area. Cumulative effects on native plant communities are likely, but limited.

HIGH: Obvious adverse effects within the project area and probable
(7-10) expansion of noxious weed infestations to areas outside the project area. Adverse cumulative effects on native plant communities are probable.

The Risk Rating is obtained by multiplying Factor 1 by Factor 2. For this project, the Risk Rating is one **(8)** or **(LOW)**. This indicates that the action will have minimal affect on weeds within the allotment. The action should proceed as planned and control treatment should be initiated as noxious weeds become established in the allotment.

NONE: Proceed as planned.
(0)

LOW: (1-10) Proceed as planned. Initiate control treatment on noxious weed
populations that get established in the area.

MODERATE: (11-49) Develop preventative management measures for the proposed project to reduce the risk of introduction or spread of noxious weeds into the area. Preventive management measures should include modifying the project to include seeding the area to occupy disturbed sites with desirable species. Monitor area for at least 3 consecutive years and provide for control of newly established populations of noxious weeds and follow-up treatment for previously treated infestations.

HIGH: Project must be modified to reduce risk level through
(50-100) preventive management measures, including seeding with desirable species to occupy disturbed sites and controlling existing infestations of noxious weeds prior to project activity. Project must provide at least 5 consecutive years of monitoring. Projects must also provide for control of newly established populations of noxious weeds and follow-up treatment for previously treated infestations.

Reviewed by: _____
Noxious Weed Coordinator

Date